

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

Jane Doe,)	
)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 2:24-cv-1682-RMG-KFM
)	
Weston & Sampson Engineers, Inc. and Jason)	
Roberts,)	
)	
Defendants.)	
)	
)	

DEFENDANT’S LOCAL CIVIL RULE 26.01 INTERROGATORIES

Defendant Weston & Sampson Engineers, Inc. (“Defendant” or W&S”), by and through its undersigned counsel, reserving the right to supplement or amend, provides the following responses to the Court’s Local Civil Rule 26.01 Interrogatories as follows:

A. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

Response: None known at present.

B. As to each claim, state whether it should be tried jury or nonjury and why.

Response: Plaintiff has requested and is entitled to a jury trial on all non-equitable issues.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

Response: W&S is not a publicly traded company. W&S is not a parent of any

publicly traded company, subsidiary, partner or affiliate. No publicly owned company owns ten percent or more of any outstanding shares or other indicia of ownership of W&S. W&S does not own ten percent or more of the outstanding shares of a publicly owned company.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

Response: Defendant does not challenge the appropriateness of the division in which this matter was filed.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.¹

Response: No.

F. If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

Response: Defendant is properly identified.

G. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe in detail the basis of said liability.

Response: Because Defendant is not presently aware of any person or entity that is liable to Plaintiff, it makes no such contention at this time, but reserves the right to amend this response if necessary.

¹ This information is required in addition to completion of the “related cases” block on the JS44 Civil Cover Sheet. Although the Civil Cover Sheet requires only that you disclose pending related cases, this interrogatory and this District's assignment procedures require disclosure of any prior or pending related case whether civil or criminal. Therefore, both categories should be disclosed in response to this interrogatory as well as on the JS44 Civil Cover Sheet.

H. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name—and identify the citizenship of—every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court’s jurisdiction under § 1332(a).

Response: Not applicable.

Respectfully submitted this 16th day of May, 2024.

By: s/ D. Randle Moody, II

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